

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	Cr. No. 15 CR 10146 FDS
)	
v.)	
)	
1. WILLIE BERRY , a/k/a “Sco,” and)	
a/k/a “Scodough,”)	
2. TONY BERRY , a/k/a “Mazibrawl,”)	
3. FRANCISCO ARIAS , a/k/a “Emilio)	
Perez,”)	
4. ANTONIO CHATMAN ,)	
5. DAVID COKE , a/k/a “Slime,”)	
6. ROSHAUN HAWKINS , a/k/a “Pretty,”)	
7. JUAN LARA , a/k/a “Miguel,”)	
8. DESMOND PERSON , and)	
9. JAMES WILLIAMS ,)	
Defendants.)	

PROTECTIVE ORDER

In connection with the above-entitled case, the United States, by its attorneys, has moved for a protective order regarding the production of the discovery in this case. The defendants, through their respective counsel shall abide by the following terms:

- a. All members of the Defense Team¹ shall execute either this Agreement² or the attached Acknowledgement of the Agreement prior to receiving, accessing and/or reviewing any Discovery Materials.
- b. The Defense Team shall maintain the Discovery Materials in accordance with this Agreement and they shall be used by the Defense Team solely and exclusively in connection with the preparation for trial and trial of this case.

1 For the purposes of this Order and Agreement, the term “Defense Team” shall include attorneys of record, support staff, investigators and other individuals retained to participate in the defense. The Defense Team excludes anyone affiliated with a defendant in another unrelated case under an explicit or implicit joint defense agreement, unless authorized to do so by further order.

2 This Order and Agreement governs all discovery produced in this case, from the date of this Agreement forward (hereinafter referred to as the “Discovery Materials”).

- c. The Discovery Materials shall be accessed, reviewed and/or copied only by members of the Defense Team. Counsel for the respective defendants shall maintain a signed copy of this Order and the Agreement in their files.
- d. The Defense Team shall not provide or distribute any copies of any Discovery Materials to defendants outside the terms set forth in this Order.
- e. That each defendant endorse the attached non-disclosure order stating that he/she will not disclose, copy, reproduce, share, or disseminate (or cause to be) the Discovery Materials given to him/her by his/her counsel of record;
- f. That counsel of record uniquely watermark all Discovery Materials provided to his/her respective client; and
- g. That counsel of record provides the Court, ex-parte and under seal, with a written record documenting the unique watermark placed on the Discovery Materials provided to his/her client and the corresponding Bates numbers.

The terms and limitations of this Order and Agreement will continue to be in effect and binding following the termination of the case.

So Ordered,

HON. MARIANNE B. BOWLER
United States Magistrate Judge

Dated: